

**UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE AT MEMPHIS**

ALLISON HAMES,

Plaintiff,

VS.

**No. 2:18-cv-02121-SHM-cgc
JURY DEMANDED**

**SUNTRUST BANK,
CITIBANK, N.A., and
JEFFREY CRANFORD,**

Defendants.

PLAINTIFF'S MOTION TO LIFT STAY ON PROCEEDINGS

COMES NOW the Plaintiff, Allison Hames, by and through her legal counsel of record, Kevin A. Snider of Snider & Horner, PLLC, and hereby moves this Court to lift the stay on these proceedings. As grounds the Plaintiff would state and show as follows:

On June 11, 2018, the parties filed a Joint Motion to Stay Proceedings for 120 days, Document 26.

On June 11, 2018, this Court granted said Joint Motion to stay these proceedings 120 days.

Obviously, the 120 days has now passed and the Plaintiff wishes to proceed forward in this matter and also proceed forward with her Motion for Default Judgment against Defendant Cranford.

Prior to filing this Motion, the Plaintiff's counsel attempted to resolve the issues in this Motion with opposing counsel who both informed the Plaintiff's counsel that their respective client does not consent to lift the stay unless it would be for the purpose of dismissing their respective client from this lawsuit which the Plaintiff is not willing to do.

WHEREFORE PREMSIES CONSIDERED, the Plaintiff prays that this Court enter an Order lifting the stay since the 120 days has now passed, reset the scheduling conference in this matter, require the Defendants SunTrust Bank and Citibank, N.A. to file a responsive pleading to the Complaint within twenty-one (21) days from the date of entry of the Order lifting the stay (as reflected in this Court's prior Order, Document 27), and for any other relief that is just and proper.

Respectfully submitted,

SNIDER & HORNER, PLLC

By: /s/ Kevin A. Snider
Kevin A. Snider (BPR # 18231)
Attorney for Plaintiff
Corporate Gardens
9056 Stone Walk Place
Germantown, TN 38138
T: (901) 751-3777
F: (901) 759-0041

CERTIFICATE OF SERVICE

I, Kevin A. Snider, hereby certify that the foregoing document has been properly filed with the Clerk of Court and properly served upon the parties of record via the Court's ECF system and via U.S. Mail to Defendant, Jeffrey Cranford, at 1401 Albert Drive, Modesto, CA 95355 this the 12th day of November, 2019.

By: /s/ KEVIN A. SNIDER